



EPA Region 5 Records Ctr.



314019

Environment Health & Safety, WTC 2G2  
PO Box 9777  
Federal Way, WA 98063-9777  
Telephone: (253) 924-3746  
Fax: (253) 924-6182  
E-Mail: Jennifer.hale@weyerhaeuser.com

October 17, 2007

Mr. Sam Chummar, Remedial Project Manager  
U.S. Environmental Protection Agency - Region 5  
Superfund Division - Remedial Response Branch #1  
77 W. Jackson Blvd. (SR-6J)  
Chicago, IL 60604

Subject: Response to Comments – Letter Dated October 11, 2007  
Plainwell Mill, Operable Unit No. 7, Allied Paper, Inc./Portage Creek/Kalamazoo River Site  
*Risk Analysis for the Plainwell Mill Banks Emergency Action*

Dear Sam:

Attached for your use is a summary of responses to your October 11, 2007, comment letter on the *Risk Analysis for the Plainwell Mill Banks Emergency Action*. The Final Health and Safety Plan (HASP) has been modified to incorporate these responses and is being submitted with this letter to United States Environmental Protection Agency (USEPA) as required by the 2005 Consent Decree between Weyerhaeuser and the USEPA.

1. Emergency Route, Page 4 – It is not clear if the Borgess Pipp Hospital is prepared to handle a hazardous material accident victim.

*Borgess Pipp Hospital has emergency medical and surgical services and an EMS response team. They are identified on their Internet site as a Level 1 Trauma Center.*

2. Hazard Evaluation, Page 9 – The OSHA PEL value for Aroclor 1254 is TWA 0.5 mg/m<sup>3</sup> (skin). It is recommended that the value in the table (1 mg/m<sup>3</sup>) be confirmed and the correct references be provided.

*The current OSHA PEL of 1 mg/m<sup>3</sup> is for Aroclor 1242. Since the chemical hazard is described as "PCB mixture," RMT will replace the current OSHA PEL of TWA 1 mg/m<sup>3</sup> with the OSHA PEL of TWA 0.5 mg/m<sup>3</sup> since this represents a more conservative value.*

3. Hazards/Tasks, Page 19 – In the section specifying applicable regulations "Excavations and Trenching" is not checked. Other portions of the RA indicate that there will be excavations.

*The final Health and Safety Plan (HASP) will specify that regulations for excavation are applicable.*

4. Applicable Safety Standards or Regulations, Page 19 – "Respiratory Protection" is not checked. Other portions of the RA indicate that Level C will be required when dust levels are greater than 15 mg/m<sup>3</sup> above the background reading taken prior to work commencing.

*The final HASP will include a check that the regulations for respiratory protection are applicable due to the possible dust generation from construction activities.*

5. Protection Level Change Criteria, Page 24 – The text states that "Change to Level C when dust levels are greater than 15 mg/m<sup>3</sup> above the background reading taken prior to work commencing." It is recommended that this value be confirmed and the correct references be provided.

*The OSHA PEL for "Particulates not otherwise regulated" is 15 mg/m<sup>3</sup> total dust (1910.1000 Table Z-1). As described in the air monitoring plan, based on the conditions at the site, the OSHA PEL for "Particulates not otherwise regulated" is the action level for upgrading respiratory protection since this measure is more sensitive than the airborne PCBs (see calculations included with the air monitoring plan).*

6. Air Monitoring, Page 26 – A footnote in the Air monitoring section says "...a detailed Air-Monitoring Plan should be developed and attached..." No such plan was available for review.

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*RMT has developed a separate air monitoring plan, which will be included with the Final HASP.*

7. Air Monitoring, Page 26 – The last column in the Mini-RAM portion of the air monitoring section contains information regarding upgrade of PPE based on readings. This is consistent with information provided elsewhere in the RA, but the “check-box” in the column is not checked.

*RMT will check the box for the mini-RAM monitoring.*

8. Air Monitoring, Page 26 – No information is provided regarding maintenance and calibration procedures for the Mini-RAM.

*The Mini-RAM will be maintained and calibrated per the manufacturer's recommendations in the equipment manual. A copy of the equipment manual will be kept in the on-site job trailer.*

9. Decontamination Procedures, Page 28 – It is not clear how the water, which will be used for equipment decontamination, will be collected and disposed of.

*The decontamination area will be connected to the residuals containment pad drainage system. Water generated during decontamination will be contained in the drainage system and sent to a sump where the water will be pumped to the on-site water treatment system. Additional information regarding the decon water disposal is included in the FSP.*

10. Emergency Response – An Emergency Response Plan as required by 191 0.120(1) is not included in the RA. Some information regarding severe weather emergencies is provided in the PPE section (p.24).

*The emergency response section is included as Section 2 to the risk analysis (RA). Additional information will be added in an updated Risk Analysis Section 2 that describes how employees are to respond to medical, fire, severe weather, water rescues, and spill emergencies. A separate Spill Contingency Plan has also been developed and will be attached to the HASP.*

11. Emergency Response – A map to the nearest hospital is not provided in the RA. Although not expressly required by OSHA, most Health and Safety Plans (HASP) include a map.

*The map was inadvertently excluded from the HASP sent to the U.S. EPA. A copy of the map is provided below.*

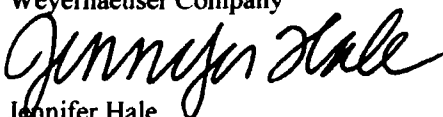
12. Emergency Response – The RA does not specify where the hospital route map will be posted. It is recommended that the location/ posting area of the hospital map be specified in the RA.

*The hospital route map will be in the HASP kept on-site and posted on the job trailer. This information has been added to the RA in Section 2, Contingency Planning.*

We appreciate your comments on our draft HASP. If you need additional copies of this Final HASP, please contact me via telephone at 253-924-3746 or e-mail ([Jennifer.hale@weyerhaeuser.com](mailto:Jennifer.hale@weyerhaeuser.com)). Thank-you again for your time on this document.

Sincerely,

Weyerhaeuser Company



Jennifer Hale  
Environmental Manager

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cc: Paul Bucholtz, MDEQ  
Eileen Furey, C-14J  
Michael Berkoff, SR-6J  
Jim Saric, SR-6J  
Kathy Huibregtse, RMT, Inc.